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February 18, 2009

Joseph Lesinski
James W. Childress & Associates, LLC
1010 Market Street, Suite 500
St. Louis, MO 63101

Re: Todd Beckman v. Great Northern Insurance Co., et al.
Case No. 08-CV-0862-AGF

Dear Joe:

I will attempt one more effort at resolving the discovery issues raised in your motion.

First, for the time being the matters within the Amended Notice of Video Taped Deposition to which you have objected that are of greatest concern to me are the ones dealing with other litigation and administrative proceedings (topics 6, 7 and 8). Thus, for the time being, I propose that if you will waive your objections to topics 6, 7 and 8, and we will withdraw the request as to item 11 (dealing with other claims in the geographic area for the dates of April 1, 2 and 3, of 2006).

Secondly, as to the documents requested, we would, for the same reasons, withdraw for the time being requests 5 and 7.

If this helps, let me know so we can avoid involving the Court needlessly. I would be glad to visit further about ways in which to simplify discovery into other claims, litigation, and administrative proceedings. However, to date I have not received from you any indication as to how this information is kept by the Companies so I don't know how else to request it.

It seems that many of these issues have already been raised in other first party litigation involving your client and decided in favor of producing the documents sought. *Brown v. Great Northern Ins. Co.*, Not Reported in F.Supp.2d, 2006 WL 2246408 M.D.Pa., 2006. Accordingly, I assume that what was once assembled can be assembled again and updated without much difficulty.

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Finally, I request that you produce the requested documents on February 23. This gives time to review them in advance of deposing your representative.

Thank you.

Very truly yours,

BERRY WILSON, L.P.C.

Michael G. Berry

MGB:ls
cc: Todd Beckman
Bruce Bartlett